

October 28, 2020

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VIA EMAIL @ KYLE.M.OWENS@USCG.MIL

MSTC Kyle M. Owens MSU Savannah Incident Management Division United States Coast Guard 100 W. Oglethorpe Ave., Ste. 1017 Savannah, GA 31401

Re: Notice of Gasoline Leak

Ocean Petroleum Inc., 1025 Bay Street, Brunswick, GA 31520

Dear Chief Owens:

This letter serves as notice of a recent leak of gasoline to the ground surface at Ocean Petroleum Inc.'s facility located at 1025 Bay Street, Brunswick, Georgia 31520. On or about June 25, 2020, Ocean Petroleum personnel conducted a review of product inventory and discovered a discrepancy in the regular gasoline AST. At the time of this discovery, the regular gasoline AST was out of service because Ocean Petroleum's pump contractor had removed the AST pump on or about March 26, 2020 for repair or replacement. Upon learning of the discrepancy, Ocean Petroleum personnel immediately inspected the tank, lines, and surrounding area for a potential leak. Ocean Petroleum did not locate any leak, nor did they discover any signs of a release such as soil staining, stressed vegetation, pooling product, or petroleum odors. Ocean Petroleum continued to inspect the area regularly and also double-checked its inventory calculations, but could not locate a release or the reason for the inventory discrepancy.

Approximately 10 days after the initial discovery of the inventory discrepancy, Ocean Petroleum personnel discovered a slow drip from the supply pipe that had connected to the regular gasoline pump that had been removed by its contractor. This slow drip was very difficult to find because it was only visible from one specific location amongst the piping and containment walls in the AST area and the leak was dripping onto a concrete pad and then seeping off of the side of the base to the ground surface. The location of the leak is approximately between the two large 125,000 gallon empty ASTs in the southeast corner of Ocean Petroleum's property. We believe a significant amount of the lost gasoline volatilized before reaching the soil surface as it seeped down the side of the concrete pad.

Once this drip was located, Ocean Petroleum discovered that when the pump contractor removed the regular gasoline pump from service the contractor did not blank the supply pipe to the pump. The contractor had closed the supply line valve when the pump was removed, but it

appears that even when the valve is closed there is a slow leak past the valve. Ocean Petroleum immediately contacted the pump contractor to blank the supply pipe, which was completed on or about July 8, 2020. No product has leaked from the supply pipe since the contractor blanked it off the supply pipe.

Since the discovery of the leak, Ocean Petroleum's environmental consultant has been overseeing the delineation and removal of impacted soil. The horizontal extent of the soil removal is completed and vertical excavation has occured to a depth of approximately four or five feet below surface. Approximately 50 cubic yards of soil has been stockpiled for offsite disposal under manifest.

Thank you for your consideration of this matter and we can provide additional information as our investigation and remediation efforts continue.

Sincerely,

MORRIS, MANNING & MARTIN, LLP

Gerald L. Pouncey, Jr.